

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 13-10200-GAO
)
 DZHOKHAR TSARNAEV)

SEALED MOTION TO SEAL MOTION FOR FOREIGN DEPOSITION

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves to file this motion and the accompanying Motion for Foreign Deposition (and appended exhibit) under seal. As grounds therefor, undersigned counsel states that the motion extensively quotes and references discovery material subject to the Protective Order in this case. In addition, we are concerned that publicity about the role or importance of potential witnesses in Russia may impact the safety of our travel to Russia, and as our ability to obtain the cooperation of other Russian citizens.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys



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Certificate of Service

I hereby certify that this document I have caused the foregoing document and exhibit to be served on counsel for the United States by hand delivery on November 17, 2014.

